

Trenten D. Klingerman
Direct (765) 423-7052
E-mail tdk@stuartlaw.com

**STUART &
BRANIGIN^{LLP}**
LAWYERS

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FEDERAL ELECTION
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COUNSEL

2008 MAY 22 A 10:48

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May 21, 2008

Via Federal Express - Overnight Delivery

Jeff S. Jordan, Esq.
Supervisory Attorney
Complaints of Examination & Legal Administration
Federal Election Commission
999 East Street N.W.
Washington, D.C. 20463

**RE: Complaint filed by Adam Stant
Federal Election Commission - Case No.: MUR 5997**

Dear Mr. Jordan:

Enclosed herewith please find a response of The Trustees of Purdue University ("Purdue") to the complaint filed with the Federal Election Commission by Adam Stant. The undersigned legal counsel in this law firm has been designated by Purdue to respond on its behalf (See Statement of Designation of Counsel filed concurrently herewith).

If you have any questions, or if I may be of any assistance, please do not hesitate to contact me.

Very truly yours,


Trenten D. Klingerman

TDK/mbk
Enclosures

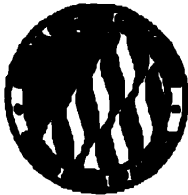
Reply to Lafayette Office

300 Main Street • Suite 900 • P.O. Box 1010 • Lafayette, Indiana 47902 • (765) 423-1561 • Fax (765) 742-8175
8888 Keystone Crossing • Suite 640 • Indianapolis, Indiana 46240 • (317) 574-7245 • Fax (317) 574-7050

29044223129

5/07/2008 10:08 IFAX
FROM

+ FaxForward 018/018
(WED) MAY 7 2008 9:22/ST. 9:13/No. 6800052921 P 16



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2008 MAY 22 A 10:49

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Client.
FAX (202) 218-3923

MUR# 5997

NAME OF COUNSEL: Trenten D. Klingerman

FIRM: Stuart & Branigin LLP

ADDRESS: 300 Main Street, Suite 900

Lafayette, IN 47901

TELEPHONE- OFFICE (765) 423-1561

FAX (765) 428-8175

The above-named individual and/or firm is hereby designated as my
counsel and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission.

5/12/08
Date

Respondent/Client Signature

Executive Vice President &
Title Treasurer

RESPONDENT/CLIENT Morgan R. Olsen, Ph.D.
(Please Print)

MAILING

ADDRESS: 230 Hoyde Hall, 610 Purdue Mall

West Lafayette, IN 47907-2040

TELEPHONE-HOME ()

BUSINESS (765) 494-9705

Information is being sought as part of an investigation being conducted by the Federal Election
Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section
prohibits making public any investigation conducted by the Federal Election Commission without
the express written consent of the person under investigation

Rev. 2006

29044223130

FEDERAL ELECTION COMMISSION

IN THE MATTER OF
COMPLAINT FILED BY:

ADAM STANT

Complaining Party

)
)
)
)
)
)

CASE NO: MUR 5997

RESPONSE OF RESPONDENT
THE TRUSTEES OF PURDUE UNIVERSITY

Pursuant to the request of Jeff S. Jordan, Supervisory Attorney, Complaints Examination & Legal Administration, The Trustees of Purdue University ("Purdue" or the "University"), by its designated counsel, responds as follows to the Complaint filed with the Federal Election Commission ("FEC" or "Commission") by Adam Stant.

I. INTRODUCTION

Adam Stant ("Stant"), a graduate student in Purdue's political science department filed the instant complaint with the FEC, alleging that the University unlawfully supported the presidential campaign of Senator Barack Obama. Specifically, Stant alleges that Laurent Wrzesinski ("Wrzenski"), a fellow graduate student in the political science department, used University computing resources to produce "an unknown quantity of printed materials" on behalf of Senator Obama's campaign.

Once Stant informed the University of the printing of the materials, the University investigated the matter. The University determined that the materials produced by Wrzenski were, in fact, produced for the benefit of a chapter of "Students for Barack Obama." one of many University-recognized student organizations. Wrzenski is a student leader in that organization. Purdue asked for, and has received, compensation from the student organization for its use of University resources in producing the

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information. The University clearly communicated to Stant and to the public that it does not support any party or candidate in the 2008 Presidential Campaign.

Purdue respectfully requests that the Commission dismiss Stant's baseless Complaint, and close its file on this matter.

II. RELEVANT FACTS

A. Purdue University

Founded in 1869, Purdue University is the State of Indiana's designated land-grant institution. The Trustees of Purdue University is a body corporate created by the Indiana legislature. IND. CODE § 21-23-2-2. The Trustees of Purdue University operate Purdue University. IND CODE §§ 21-27-7-4, 21-27-7-5. This includes the power to "govern, by regulation and other means, the conduct of students, faculty, employees, and others while upon the property owned, used, or occupied by [Purdue University]." IND. CODE § 21-39-2-2.

B. "Students for Barack Obama"

Purdue policies governing the recognition of student organizations provide, in relevant part, that:

- A. A group of Purdue students may become a student organization upon formal recognition by the Office of the Dean of Students. According to Article 13 of the Purdue University Bill of Student Rights, any student group recognized as a Purdue student organization shall be entitled to the use of available University facilities in conformity with regulations. *Recognition shall not imply University endorsement of group goals and activities.* Such recognition is contingent upon the following considerations:

1. The approval of the constitution of the proposed student organization by the Office of the Dean of Students. An outline of the basic information to be

included in a constitution is available in the Office of the Dean of Students in Schleman Hall.

2. The filing of a list of eligible officers including the name of a faculty advisor.
3. The establishment of a financial account with the Business Office Student Organizations.

Exhibit "A," Regulations and Procedures for Recognizing Student Organizations, Part 7, Section II(A). The regulation of recognized student organizations is the responsibility of the Office of the Dean of Students, and the Business Office of Student Organizations exercises financial responsibility over recognized student organizations who must maintain financial accounts with that office. *Id.*, Part 7, Section I.

Purdue currently recognizes several student organizations that are connected with a variety of national political interests, including various presidential campaigns. In the Academic Year 2007-2008, the University recognized "College Democrats," "College Republicans," "Republican Women," "Students for Hillary," "Students for John McCain," and "Students for Ron Paul Revolution." **Exhibit "B," Declaration of Stephen J. Akers, Executive Associate Dean of Students at ¶ 2(hereinafter, "Akers Decl.")).**

Another such organization is "Students for Barack Obama," a student organization with the stated primary purpose of "gain[ing] volunteers and dedicated supporters of Presidential candidate Senator Barack Obama, register as many students and faculty at Purdue University to vote despite candidate or party affiliation, and increase voter turnout." *Id.* Wrzesinski, a graduate student in Purdue's political science department, is the Purdue chapter president of "Students for Barack Obama." *Id.*

C. Wrzesinski's Printing of Materials in 2007-2008 Academic Year

In his capacity as chapter president for "Students for Barack Obama," Wrzesinski printed approximately 3,000 flyers using University computing resources and paper during the 2007-2008 Academic Year. (Akers Decl. at ¶ 3) The flyers advertised various trips that "Students for Barack Obama" had scheduled to support the Obama campaign in Ohio, Mississippi and Missouri. *Id.* The flyers clearly identified the organization as "Purdue University Students for Barack Obama." *Id.* The flyers do not contain any University logo or any statement that can fairly be construed as University support.

Stant raised the issue of Wrzesinski's use of University resources to print the flyers with the University in early April, 2008. (Akers Decl. at ¶ 4) Executive Associate Dean of Students Stephen J. Akers investigated Stant's allegations immediately thereafter. (Akers Decl.). Dean Akers interviewed Wrzesinski, and Wrzesinski indicated that he had printed approximately 3,000 flyers for his organization. (Akers Decl.) Dean Akers inquired whether "Students for Barack Obama" had reimbursed the University for the use of its resources, and Wrzesinski advised that the group had not yet reimbursed the University. *Id.*

Wrzesinski stated that he would make arrangements to reimburse the Business Office for Student Organizations for the use of University resources, and Dean Akers agreed that it was appropriate for Wrzesinski and "Students for Barack Obama" to pay for the use of University resources. *Id.* "Students for Barack Obama" reimbursed Purdue \$120.00 for 3,000 copies on May 19, 2008. *Id.*

D. Purdue's Response to Media Inquiries Regarding "Students for Barack Obama"

At or around the time that Stant raised the issue of the "Students for Barack Obama" flyers with the University, he also wrote regarding the matter on several World Wide Web sites under the title "Purdue Students Break the Law for Obama." Exhibit "C," copy of "Blue Indiana" entry regarding Stant's "reporting" of the incident. Stant's story was picked up by the *Lafayette Journal & Courier*, which published a story regarding Stant's claim on April 18, 2008. Exhibit "D," copy of April 18, 2008 article in *Lafayette Journal & Courier*. In connection with that news article, the University responded that it had investigated the matter, and expected reimbursement from "Students for Barack Obama." *Id.* The University clearly communicated that Purdue "does not endorse or advocate on behalf of any political candidate or political party." *Id.*

III. LAW AND ARGUMENT

A. Relevant Federal Election Campaign Act provisions

The Federal Election Campaign Act of 1971 ("FECA") provides that it is unlawful for "any corporation" to make a contribution or expenditure in connection with any election to any political office. 2 U.S.C. § 441b(a). "Expenditure" is defined by FECA as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § (9)(A)(i). Thus, for the Commission to find that the flyers at issue in this case comprise an unlawful "contribution," it must conclude that the *University* intended to produce the flyers to support Senator Obama's presidential campaign.

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There is no evidence that University made unlawful contribution or expenditure in this case. First, the evidence establishes that the ostensible "contribution" was made by "Students for Barack Obama," a recognized student organization on Purdue's campus. The flyers were paid for by "Students for Barack Obama." The flyers clearly indicate that the events advertised thereon are sponsored by "Purdue Students for Barack Obama." The University did not endorse the flyers and, when questioned about the flyers by local media, clearly stated that the University did not "endorse or advocate on behalf of any political candidate or political party." Exhibit "D." There is simply no basis for a finding that Purdue University contributed to the Obama campaign.

In the 2007-2008 Academic Year, the University has recognized student organizations which support no fewer than four presidential campaigns (*i.e.* Barack Obama, Hillary Clinton, John McCain, and Ron Paul). Further, the University has recognized College Republicans and College Democrats. The evidence does not support a finding that the University intended to support any particular political party or candidate.

B. Treatment of Student Political Activity By The Internal Revenue Service

Stant alleges that the printing of the flyers violates the University's obligations as a 501(c)(3) organization. Purdue is a tax exempt organization under 26 U.S.C. § 501(c)(3). Exhibit "E," IRS Letter dated September 29, 1987. The IRS has clearly ruled that a university's tax exempt status under § 501(c)(3) cannot be jeopardized by the political activities of its students.

The IRS has clearly stated that "[t]he prohibition on political campaign activity applies only to § 501(c)(3) organizations, not to the activities of individuals in their


private capacity." Tax Adv. Mem. 2004-46033. "The actions of students generally are not attributed to an educational institution unless they are undertaken at the direction of and with authorization from a school official." Judith E. Kindell and John Francis Reilly, ELECTION YEAR ISSUES, Exempt Organizations CPE Technical Instruction Program (FY 2002).

In this case, Wrzesinski acted in his capacity as the president of "Students For Barack Obama" when he printed flyers for the group's use. Once the University learned of the group's use, the University required reimbursement from the group and publicly clarified that the group's use of University resources did not comprise the University's endorsement of any candidate or party. There is no basis for imputing Wrzesinski's actions on behalf of the "Students for Barack Obama" to Purdue University in this case.

IV. CONCLUSION

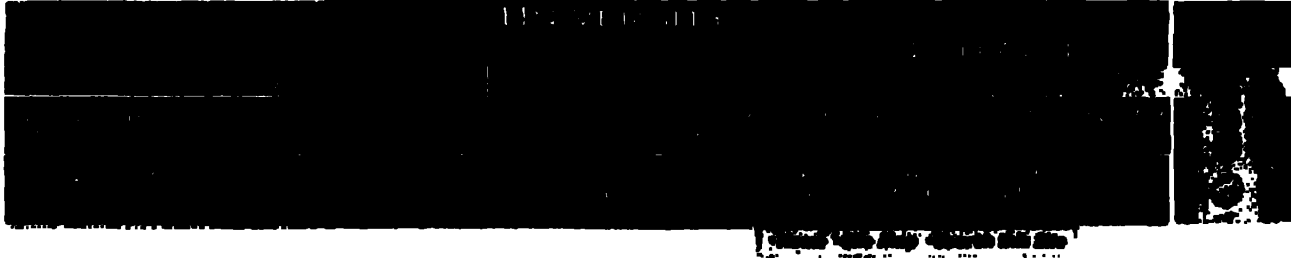
For all of the foregoing reasons, The Trustees of Purdue University respectfully requests that the Commission dismiss the complaint.

Respectfully submitted,



TRENTEN D. KLINGERMAN
STUART & BRANIGIN LLP
300 Main Street, Suite 900
P.O. Box 1010
Lafayette, IN 47902-1010
Telephone: 765-423-1561

Attorney for The Trustees of Purdue University

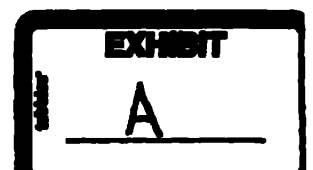


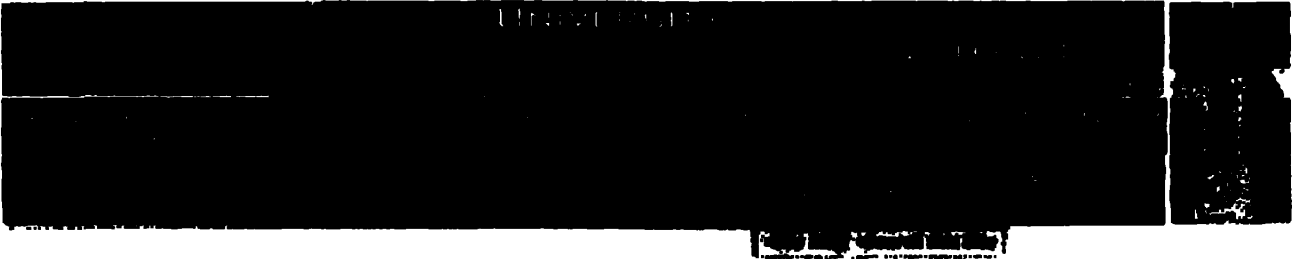
University Regulations

Part 7 — Regulations and Procedures for Recognized Student Organizations

- General Responsibilities
- Procedures for Forming and Maintaining Student Organizations
- Requirements for Members, Officers, and Advisors
- Activities and Programs
- Publicity
- Campus Mail Service
- Financial Arrangements
- Policy Against Hazing
- Violations of Rules and Regulations
- Liability Insurance
- Liaison with Outside Agencies

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University Regulations provides information for all Purdue students on the structure, policy, regulations, and procedures of the University that govern their relationship to the University in both academic and personal progress toward their ultimate educational goals. It is designed as a reference book, with direct quotations from the University Code where applicable, covering the basic areas relating to all students on the campus.

There may be problems or questions of detail, particularly with reference to policies or procedures of a student's instructor, school, or housing facility, for example, which can be answered only by the staff directly involved. Where a question regarding interpretation of a policy or procedure arises, a student should consult the Office of the Dean of Students, the Office of the Registrar, an academic advisor, a school counseling office, or other appropriate office.

Safety. The University strives to provide a safe and secure environment for students, staff, and visitors. The University distributes an annual security report containing campus crime statistics and information relating to campus safety and security policies and programs. The report is available on the Web at <http://www.purdue.edu/police/annualreport.htm>. A paper copy may be requested by calling (765) 494-8221 or contacting the Purdue University Police Department, Purdue University, West Lafayette, IN 47907.

Academic Calendar 2007-08

Nondiscrimination Policy Statement

29044225139

- General Responsibilities
- Procedures for Forming and Maintaining Student Organizations
- Requirements for Members, Officers, and Advisors
- Activities and Programs
- Publicity
- Campus Mail Service
- Financial Arrangements
- Policy Against Hazing
- Violations of Rules and Regulations
- Liability Insurance
- Liaison with Outside Agencies

Part 7 -- Regulations and Procedures for Recognized Student Organizations

Section II -- Procedures for Forming and Maintaining Student Organizations

A. A group of Purdue students may become a student organization upon formal recognition by the Office of the Dean of Students. According to Article 13 of the Purdue University Bill of Student Rights, any student group recognized as a Purdue student organization shall be entitled to the use of available University facilities in conformity with regulations. Recognition shall not imply University endorsement of group goals and activities. Such recognition is contingent upon the following considerations:

1. The approval of the constitution of the proposed student organization by the Office of the Dean of Students. An outline of the basic information to be included in a constitution is available in the Office of the Dean of Students in Schlemmer Hall.
2. The filing of a list of eligible officers including the name of a faculty advisor.
3. The establishment of a financial account with the Business Office Student Organizations.

B. To maintain status as a recognized student organization the following conditions must be met:

1. Any new or revised constitution must be submitted to the Office of the Dean of Students for approval.
2. All amendments to the current constitution must be submitted to the Office of the Dean of Students for approval.
3. A list of new eligible officers must be filed in the Office of the Dean of Students within three weeks of their election.
4. Members of student organizations are required to abide by the laws of the state of Indiana, the United States, the community, the state or country in which the organization's activities occur, and University rules and regulations.

C. The Office of the Dean of Students will notify any recognized student organization that has failed to meet the conditions for maintaining active status:

1. The student organization will be deactivated if the conditions listed in Section II-B (this is true of all section references in this part unless otherwise specified) are not satisfied.
2. The organization may request to be returned to active status once it has met the necessary qualifications.
3. If a recognized student organization is in a state of deactivation for a period of at least two years, the Office of the Dean of Students will withdraw recognition from that organization.
4. An organization may request to have recognition withdrawn at any time it chooses.

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FEDERAL ELECTION COMMISSION

**IN THE MATTER OF
COMPLAINT FILED BY:**

ADAM STANT

Complaining Party

CASE NO: MUR 5997

DECLARATION OF STEPHEN J. AKERS

Stephen J. Akers, being duly sworn upon his oath, deposes and states:

1. I have been employed as the Executive Associate Dean of Students since July 1, 1980. One of the responsibilities of The Office of the Dean of Students is to govern the recognition of student organizations. In my capacity as Executive Associate Dean of the Office of the Dean of Students, I have knowledge of the matters set forth in this declaration.

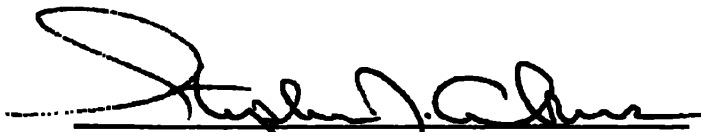
2. In the Academic Year 2007-2008, the University recognized the following student organizations connected with the 2008 Presidential Campaign: College Democrats, College Republicans, Republican Women, Students for Hillary, Students for John McCain, and Students for Ron Paul Revolution.

The University also recognized "Students for Barack Obama," a student organization with the stated primary purpose of "gain[ing] volunteers and dedicated supporters of Presidential candidate Senator Barack Obama, register as many students and faculty at Purdue University to vote despite candidate or party affiliation, and increase voter turnout." Laurent Wrzesinski, a graduate student in Purdue's political science department, is the Purdue chapter president of this organization.

3. In his capacity as chapter president for "Students for Barack Obama," Wrzesinski printed approximately 3,000 flyers using University computing resources and paper during the

2007-2008 Academic Year. The flyers advertised various trips that "Students for Barack Obama" had scheduled to support the Obama campaign in Ohio, Mississippi and Missouri. The flyers clearly identified the organization as "Purdue University Students for Barack Obama."

4. After Adam Stant raised the issue of Wrzesinski's use of University resources to print the flyers in early April, 2008, I investigated the allegation. I inquired as to whether "Students for Barack Obama" had reimbursed the University for the use of its resources and was advised by Wrzesinski that the group had not yet done so. Wrzesinski advised that he would make arrangements to reimburse the Business Office for Student Organizations for the use of University Resources. I agreed that such reimbursement was appropriate. Thereafter, "Students for Barack Obama" reimbursed Purdue \$120.00 (3,000 copies at \$.04/copy) on May 19, 2008.


Stephen J. Akers
Executive Associate Dean of Students
Purdue University

463766

Purdue University

Department of Political Science



School of Liberal Arts

INVOICE

5/15/2008

**To: Steve Akers
ODOS / SCHL**

**3,000 copies/ printing @ \$0. 04 a copy
Copies supporting Barack Obama
2008 campaign.**

120.00

Please send funds to:

**Department of Political Science
ATTN: Jessica Morefield
Room 2241/ BRNG Hall
100 N. University Street
West Lafayette, IN 47907**

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Purdue University Student Organizations Remittance Information

160923

Payee: Purdue University
Organization
STUDNTS FOR BARACK OBAMA

SOA #

Vendor Reference #
advertis

Check # 160923
Check Request #
229245

Date: 05/19/2008
Amount
120.00

TOTAL: \$

\$120.00

PURDUE
UNIVERSITY



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Have something to say? You can register and post your own stories in minutes. Find out how to use this site, and join the conversation today.

Purdue Students Break the Law for Obama

by: ManfromMiddletown

Wed Apr 09, 2008 at 12:55:07 PM EDT

A Purdue student employee operating on behalf of the Barack Obama for President Campaign has using their positions in order to divert University resources from their workplace into the Obama campaign. Laurent Wrzesinski, a Chicago native trained by the Obama campaign, and acting on its behalf on the Purdue Campus has been operating in violation of both university policy and federal law. Worse, by carrying out these actions while in the employ of Purdue University, he may have breached the University's obligations as an IRS 501 (c) 3 tax exempt organization. This breach, if fully prosecuted, would cost the University \$140 million annually in tax exemptions, \$3,500 per student at the West Lafayette campus.

ManfromMiddletown :: Purdue Students Break the Law for Obama

The Obama Connection

During the summer of 2007, Mr. Wrzesinski applied and was accepted for an internship with the Obama campaign working in Iowa. A large part experience of Obama interns in Iowa was Camp Obama, the purpose of which was described by Obama national youth vote director as:

"We are training them, teaching them how to be effective, showing them what their role is in our strategy to win the election ... We're taking people from raw enthusiasm to capable organizers." *(bolding added for emphasis)*

Mr. Wrzesinski would continue in his organizational capacity on behalf of the Obama campaign in violation of Purdue Executive Memorandum B-4 prohibiting persons employed by the University to carry out campaign work that (1) interferes with their work obligations, and/or (2) to use their position in order to affect the outcome of an election and/or effect the votes of employees and/or students.

Following grossly inappropriate behavior involving the diversion of resources of the department employing Mr. Wrzesinski the University was informed of what had been occurring. The actions of Mr. Wrzesinski and the others included the printing of campaign fliers at departmental expense and the recruiting of students over whom they held grading responsibilities to volunteer for the Obama campaign in exchange assistance with class work. Following a meeting between graduate students associated with the Department of Political Science, the same department employing Mr. Wrzesinski, and university officials in which this and other matters of misconduct within the department were discussed.

Dr. Stephen Akers, Purdue's Executive Associate Dean of Students met with Mr. Wrzesinski to ask him to stop using departmental printers in order to produce election materials for the

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- Eye on Indianapolis
- Fort Wayne Left
- Fort Wayne Politics
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- Left in Aboite
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- Liberal Indiana
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- stAllo's way

EXHIBIT

C

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Obama campaign. The University has since

Mr. Wrzesinski was told another student who has since spoken to me that the most drastic action that could be taken against him would involve a \$10,000 fine. This individual who spoke with Wrzesinski, says that Wrzesinski told him that he would gladly take out a loan to pay the fine in order to continue with his actions.

Again, Mr. Wrzesinski continued with actions in violation of both Purdue University regulations and federal law prohibiting non-profit organizations to make contributions to federal campaigns. I will be presenting documentary evidence substantiated with the details of how these violations occurred.

Violations of University Policy and Federal Law

Shortly after returning to Purdue from Iowa, Mr. Wrzesinski began to organize road trips back to Iowa to support the Barack Obama for President campaign. Within a matter of months, Wrzesinski had converted a large number of the graduate students employed by the Political Science department into a solid core of Obama supporters who marginalized those within the department who supported Sen. Clinton or simply didn't care. As bad as it was that Wrzesinski and the rest were creating a hostile work environment for those who did not share their political beliefs, the problem would soon grow much larger and more troubling.

After Obama's win in the Iowa Caucus, Wrzesinski began to organize much larger road trips to canvass for Obama in battleground states. And this is when what had previously been a limited irritation gave way to major violations of University policy and federal law. In order to help grow the group of students, Purdue Students for Barack Obama, he was organizing grow and to recruit individuals to do field work on behalf of Senator Obama, Wrzesinski began to abuse his position within the university.

At Purdue, students are provided a \$40 yearly printing account that may be used for personal printing at computer labs operated by the University. In addition to this, many departments offer students free printing for journal articles and other uses associated with academic printing. Wrzesinski is employed as a teaching assistant by the department of Political Science, and as a consequence of his position as an employee of the department and a PhD student he has the privilege of printing academic materials in the computer labs maintained by the department in Beering Hall 2208 and 2245, the undergraduate and graduate labs respectively. Printing in these labs occurs at university expense, and is paid for by Indiana taxpayers and Purdue students.

Beginning in January of 2008, Wrzesinski began to print materials intended to be used to support the candidacy of Sen. Obama at university expense. Within a period of weeks other graduate students began to notice the printers in both labs were running out of ink in a matter of a week or two. This is a serious violation of Purdue Executive Memorandum B-4.

Wrzesinski began to brazenly misuse university resources in order to benefit the campaign of Sen. Barack Obama. Wrzesinski soon spent so much of his time working in the department on campaign work, that computer #5 in Beering 2208 became known as "the Obama campaign's" seat in the laboratory by other graduate students.

I have MS-Word copies of several of the documents produced by Wrzesinski for the Obama campaign at University expense demonstrating that they were produced on copies of Word licensed by the Purdue University Department of Political Science. These documents were copied off computers in Beering 2208 and 2245, and this is reflected in the files property information. I have rendered several of the documents into a picture files in order to display them here. Upon request, I can produce the original MS-Word copies.

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STUDENTS Barack Obama

"...It's about the past vs. the Future." — Barack Obama, 1-25-08

SEE BARACK OBAMA SPEAK **LIVE**

and HELP BARACK WIN ST. LOUIS!!!

Saturday February 2nd

Purdue Students for Barack Obama are going to St. Louis again next Saturday ** We leave at 7 AM ** We'll volunteer by spreading word of the event from 12 - 5 ** After pizza, we will go see Barack Obama speak live!!!

Your choice: 1) Return to West Lafayette very late Saturday night. Or 2) head back Sunday morning (free housing). We'll be back in plenty of time for the Super Bowl.

It's No Accident Voters Age 18-29	Iowa %	New Hampshire %	Nevada %	South Carolina %
	Obama 87 Clinton 11	Obama 48 Clinton 21	Obama 55 Clinton 33	Obama 67 Clinton 22

WHO: Purdue University Students for Barack Obama
WHAT: Trip to volunteer for Barack and then see him speak!
WHEN: Saturday, February 2nd
WHERE: St. Louis, Missouri
WHY: Barack Obama's campaign has focused on OUR generation as the engine for social change. It could be decided before we have another serious candidate so committed to young people.

This is 3 days before Super Tuesday, Feb. 5th, when Missouri and over 20 other states choose between Barack Obama and Hillary Clinton. Don't miss this chance to help Barack beat Hillary! And don't miss the opportunity to see Barack speak in person!!

FOR MORE INFORMATION CONTACT:

Laurent at 765-543-4996 or lwzasin@purdue.edu

Join the Purdue Students for Barack Obama Facebook Group

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Blue Mass. Group
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BlueNC
Bob Gelgar
Booman
Brendan Calling
BRAD Blog
Buckeye State Blog
Burnt Orange Report
Capitol Annex
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Frameshop
Green Mountain Daily
Greg Palast
Hoffmania
Horse's Ass
Hughes for America
In Search of Utopia
Is That Legal?
Jesus' General
Jon Swift
Juan Cole
Keystone Politics
Kick! Making Politics Fun
KnoxViews
Lawyers, Guns and Money
Left Coaster
Left in the West
Liberal Avenger
Liberal Oasis
Loaded Orygun
Mahablog
Majikthise
Make Them Accountable
Matthew Yglesias
MaxSpeak
Media Girl
Michigan Liberal
Minnesota Campaign
Report
Minnesota Monitor

29044223147



MyDD
My Left Nutmeg
My Left Wing
My Two Sense
Nathan Newman
Needlenose
Nevada Today
News Dissector
Newshoggers
News Hounds
Nitpicker
Oliver Willis
onegoodmove
OpenLeft
PageOneQ
Pam's House Blend
Pandagon
People's Rep. of Seabrook
PinkDome
Politics1
Political Animal
Political Wire
Poor Man Institute
Prairie State Blue
Progressive Historians
Raising Kaine
Raw Story
Reno Discontent
Republic of T
Rhode Island's Future
Rochester Turning
Rocky Mountain Report
Rod 2.0
Rude Pundit
Sadly, No!
Saterical Political Report
Seeing The Forest
Shakesville
SiroteBlog
SistersTalk
Slippy the Bush Kangaroo
Slacktivist
Smirking Chimp
SquareState
Suburban Guerrilla
Swing State Project
Talking Points Memo
Talk Left
Tapped
Taylor Marsh
Tattered Coat
Texas Kaos
The Albany Project
The Blue State
The Carpetbagger Report
The Democratic Daily
The Hollywood Liberal
The Reaction
The Talent Show
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Town Called Dobson
Wampum
War and Piece
WashBlog
Watching the Watchers
West Virginia Blue
Young Philly Politics
Young Turks



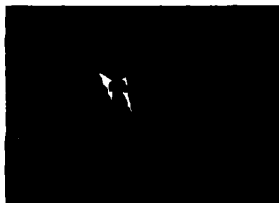
March 11 Election Day
Vote for
BARACK OBAMA!
AND SPREAD THE WORD!!!

MISSISSIPPI **FOR** **BARACK**

"It's about the past vs. the Future..."
—Obama, 2/5/08

Polls open from 7 AM until 7 PM
Find Polling Location: 800-820-6786

YES WE CAN!



March 11 Election Day
Vote for
BARACK OBAMA!
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MISSISSIPPI **FOR** **BARACK**

"It's about the past vs. the Future..."
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Polls open from 7 AM until 7 PM
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YES WE CAN!

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STUDENTS. Barack Obama

"...It's about the past vs. the Future." — Barack Obama, 2-5-08

CINCINNATI-for-OBAMA TRIP

Help Get-Out-the-Vote for Barack in Ohio!

Saturday March 1st

Who/Where	Iowa %	New Hampshire %	Nevada %	South Carolina %	Super Tuesday
Voters Age 18-29	Obama 67 Clinton 11	Obama 48 Clinton 21	Obama 68 Clinton 23	Obama 67 Clinton 23	Obama 68 Clinton 30

WHO: Purdue University Students for Barack Obama
WHAT: Knocking Doors to GET-OUT-THE-VOTE for Barack Obama
WHEN: Saturday, March 1st leave 8 AM, return 7 PM
WHERE: Cincinnati, Ohio, less than 3 hours away
WHY: It's 3 days before the Ohio election. Hillary considers Ohio her "bread" if we win there, Barack will lock up the Democratic nomination for president.
COST: \$10 for the gas fund, and a few extra bucks for 2 fast food stops

This is Purdue SFSO's 7th and final trip. Last time, 67 Purdue people helped get-out-the-vote in St. Louis. Barack wound up winning Missouri by just 3,000 votes on the strength of a St. Louis landslide, and we were part of that. We look to duplicate that performance in Ohio. Join us this time, and play a part in this historical campaign!

FOR MORE INFORMATION CONTACT:

Laurent at 765-543-4996 or lwrszsln@purdue.edu

Join the Facebook Group [Purdue Students for Barack Obama](#)

In early March, Purdue university administration was advised about Mr. Wrzesinski's activities and provided the file I have displayed here.

The individuals who brought evidence of this misconduct were asked by Purdue administration to provide citations of legal code or case law demonstrating that what had been occurring was against the law.

They did.

To be clear, in printing campaign materials at departmental expense, Wrzesinski and the others committed several violations of federal law, placing both themselves and the university in legal jeopardy. Because the cost of printing these materials was paid for by Purdue University and the Department of Political Science, they did not report a campaign donation to the FEC. To the best of my knowledge, FEC filing reports made by the campaign do not reflect these in-kind contributions.

More worryingly, because the University was placed in the position of providing an in-kind contribution to the Obama campaign, Purdue is in breach of its obligations as an IRS 501 (c) 3 organization. As explained in an IRS publication on the matter, an educational organization granted tax exemption under USC 26 501 (c) 3:

A 501(c)(3) organization:

n must absolutely refrain from participating in the political campaigns of candidates for local, state, or federal office

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In fiscal year 2007, Purdue took in \$394 million in private donations, and while those contributions are currently both tax deductible for the donor and tax exempt for the University, this is only so because Purdue has a letter from the IRS indicating that it is a 501 (c) 3 organization. The illegal actions of Wrzesinski place that in jeopardy.

Wrzesinski was asked by Dr. Steven Akers, Purdue's Executive Associate Dean of Students, to stop using university resources to benefit the Obama campaign..

o the university would no longer be tax deductible for donors not tax exempt for the University. That could cost Purdue around \$140 million annually, or about \$3500 per student at the West Lafayette campus. Presumably this shortfall would have to be met either by a massive tuition increase, or an infusion of cash from the state legislature.

Wrzesinski has taken actions that may result in a \$3,500 increase in cost for young Hoosiers wishing to attend Purdue. As if we don't have enough economic hardship in this state.

Update

I've removed a section that some thought to imply that Dr. Woody Myer's campaign was involved with this upon the request of the Internet staffer there. Neither Dr. Myer's nor his campaign are involved in this.

Update 4/12/08 11:25 PM

I have a tape recording of Laurent confessing to printing out the fliers using departmental resources, and stating that he alone printed out the fliers.

He made clear that what I had seen the others printing were voter registration forms for use in a drive he was working on. For that reason I've removed the names of the other individuals. Laurent then proceeded to threaten with retaliation for producing this post. I have provided a copy of this tape to the Purdue Police.

I will be filing a complaint against Laurent and Purdue with the FEC on Monday. As soon as I have a digitized version of the tape, and Thomas's blessing, I will be making that recording available on this website. I would hope that the Obama campaign would disavow Laurent's actions.

Update 4/13/08 2:45 PM

I have updated this to reflect only those matters that I will be bringing to the attention of the FEC. I can't figure a way to post the tapes. I will be sending copies to the FEC, and I will be sharing them with the journalist that I have been working with at the Lafayette Journal and Courier.

The bottom line is that individuals employed by the university have produced materials at university expense that are designed to influence the outcome of the election. And that's inappropriate given that both the State of Indiana and student who pay tuition provide money to the University for the purpose of education. Given that I am one of only 6 of 65 graduate students in the department of Political Science from the State of Indiana, I suppose it should be no surprise that everyone else doesn't seem to care. After all it's not their taxes paying for the University to exist.

Tags: Indiana, Obama, Purdue, Election 2008, (All Tags)

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Purdue Students Break the Law for Obama | 40 comments

This story needs to be told (0.00 / 0)

If you have local media contacts, or are a member of the media I am willing to talk.

I may be reached at manfrommiddletown at lycos dot com

I will attempt to answer all questions as quickly as possible, and will be willing to provide my cell number so that we might speak. I only ask that my identity not be revealed.

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Campaign filers printed at university

BY BOB SCOTT • BSCOTT@JOURNALANDCOURIER.COM • APRIL 18, 2008

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What's this?

A Purdue University graduate student has filed a complaint with the Federal Election Commission about the use of university printers for Barack Obama's presidential campaign.

ADVERTISEMENT Adam Stant of Muncie alleges that fellow teaching assistants in the political science department used the department's printers.

He cites U.S. Code 26 501(c)3, which prohibits educational institutions with tax-exempt status from engaging in "any political campaign on behalf of (or in opposition to) any candidate for public office."

A Purdue spokeswoman said university officials don't but believe that laws were broken, they are using the case to emphasize the rules about using university resources for campaign purposes.

Teaching assistants are Purdue employees and are prohibited from using university resources for political campaigns.

"Purdue admitted it happened," Stant said Thursday.

He alleges that \$200 worth of political material was printed earlier this year on printers in the political science department.

"With the upcoming election, they need to be aware so this doesn't happen again," he said.

"It is the principle, not the amount" of money.

Stant said he is a longtime Democratic Party activist who previously supported John Edwards' presidential campaign.

Purdue officials have investigated the matter, said university spokeswoman Jeanne Norberg.

"It is our understanding that departmental printers, not copiers, were used to print filers supporting Barack

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Obama," she said. "We believe that the amount involved is less than \$150.

"To the extent that departmental printers were used, Students for Barack Obama have or will reimburse the department for the fliers that were printed."

She said Purdue "also prohibits use of its printers and other IT equipment for organized political purposes."

IT stands for information technology.

She emphasized Purdue "does not endorse or advocate on behalf of any political candidate or political party."

She said Purdue employees have been reminded this week of university policies.

She said, to the best of her knowledge, the FEC has not contacted Purdue.

Norberg declined to name the students involved because of federal privacy laws. However, graduate student Laurent Wrzesinski was named in Stant's complaint to the FEC complaint.

Stant and Wrzesinski both admitted they met with university officials, including Stephen Akers, executive associate dean of students.

Akers did not respond to telephone or e-mail requests for information, but Wrzesinski shared an e-mail Akers sent to him.

The e-mail read:

"Laurent, this is to verify that we have reviewed the issue of using University resources to print campaign fliers. I see no need for implementing disciplinary measures against any students involved with printing."

Wrzesinski said he wanted to "clear" his reputation.

When asked whether he used the department's printers for Obama's campaign, Wrzesinski declined to respond directly.

"Students for Barack Obama is a recognized campus organization at Purdue," he said. "I was an officer in Students for Obama.

"Some of this is not clear to me. I don't want to issue a blanket denial."

ADVERTISEMENT

Norberg said students and recognized student organizations have printing accounts.

"They can print up to \$40 a year at no cost," she said, "and after that, must reimburse the university."

In your voice

READ REACTIONS TO THIS STORY

Newest first 1/2



JimMcMurry wrote:

I am glad that the truth is coming out on here. Yes, I was very suspicious of the timing and did take it out on the Clinton campaign as another dirty trick. What was one to think? Bob Scott is a great reporter. To bad the truth was not able to be told in the article about the personal grudge this guy has.

4/20/2008 8:57:00 AM

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Person to Contact:
Helen A. Wiley
Telephone Number:
513-684-3578

Refer Reply to:
EP/EO Division
EIN:

35-6002041

Date:
September 29, 1987

Purdue University
Accounting Services
Freschafer Hall
West Lafayette, IN 47907

Dear Sir or Madam:

This is in response to your request for verification of your exempt status.

Our records indicate that your organization was recognized as exempt from Federal income tax in December, 1935, under section 101(6) of the Internal Revenue Code of 1939, which corresponds with section 501(c)(3) of the Internal Revenue Code of 1986.

Based on the information submitted we have classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because you are an organization described in sections 509(a)(1) and 170(b)(1)(A)(ii).

This classification is based on the assumption that your operations would continue as stated in the information you submitted. If your sources of support, purposes, character, or method of operation have changed, please let us know so we can consider the effect of the change on your exempt status and foundation status.

If you have any questions, please contact the person whose name and telephone number appear in the heading of this letter.

Sincerely yours,

Harold H. Browning
Harold H. Browning
District Director

EXHIBIT

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